

Message

From: Osborne, Russell [Russell.Osborne@dnr.mo.gov]
Sent: 1/23/2020 3:02:54 PM
To: Hanlon, Lisa [Hanlon.Lisa@epa.gov]
Subject: Tire Pyrolysis Determination

Good morning Ms. Hanlon,

My name is Russell Osborne I work for the Missouri Department of Natural Resources – Air Permitting Section. I currently have an application for the pyrolysis of tires. I have looked through old emails and comments about the subject but remain unsure of the determination.

In an old email conversation (January 4, 2017) with an former MoDNR employee I found the following response from you: “ It sounds to me like the tire pyrolysis unit is not an incinerator. According to the NHSM rule, if a material is processed before burning, then it is not considered a waste. The “processing” is what turns a waste into a fuel, and apparently shredding tires (regardless of whether it’s done on site or somewhere else) is considered to be “processing” the material into a fuel. Therefore, this pyrolysis unit couldn’t be an incinerator because the CAA defines an incinerator as something that burns *any solid waste*.”

The current proposed process I am working on does not process the tires. The company loads whole used tires into the pyrolysis reactor. Collected vapor is condensed to synoil. Non-condensable vapor (syngas) is indirectly fired to heat the chamber. Excess syngas is directed through an RTO onsite. Syngas is not sold offsite. Does this make the process a solid waste incinerator and applicable to CISWI?

If there is more information needed to help please do not hesitate to let me know!

Thank you,

Russell Osborne, E.I.T.

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